

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 24cr10296
)	
v.)	Violation:
)	
LORALIE LABROAD,)	<u>Count One</u> : Tampering with a Consumer
)	Product
Defendant)	(18 U.S.C. § 1365(a)(4))
)	
)	
)	

INFORMATION

At all times relevant to this Information:

General Allegations

1. Defendant, LORALIE A. LABROAD (“LABROAD”) was a resident of Hampton, New Hampshire.
2. From on or about April 1, 1993, until on or about July 29, 2022, LABROAD was a registered nurse licensed in Massachusetts, and from on or about January 27, 1997, until on or about March 31, 2021, LABROAD was also licensed as a registered nurse in New Hampshire.
3. From no later than December 2021, through and until at least May 12, 2022, LABROAD was employed as a traveling nurse through a New-Hampshire-based healthcare staffing company (“Staffing Company”) and was assigned to various nursing and rehabilitation facilities throughout Massachusetts.
4. Morphine was a Schedule II controlled substance. Morphine sulfate was a drug that contained morphine and was an opioid used for pain relief.
5. The United States Food and Drug Administration (hereinafter “FDA”) was an agency within the executive branch of the Government of the United States. The FDA was the

agency responsible for protecting the health and safety of the public by ensuring, among other things, that drugs intended for use in humans were safe and effective for their intended uses and that the labeling of such drugs was true and accurate. As part of its mission to protect the public health, FDA—specifically its Office of Criminal Investigations—had the authority to investigate allegations of tampering with consumer products, including drugs.

LABROAD's Tampering

6. On or about May 12, 2022, LABROAD worked, through the Staffing Company, at a nursing and rehabilitation center in Danvers, Massachusetts (“Rehab Center”).

7. While working at the Rehab Center, LABROAD treated multiple patients, including Patient 1, who was prescribed morphine sulfate for pain relief.

8. On or about May 12, 2022, LABROAD treated Patient 1 and had access to two of Patient 1's prescribed bottles of morphine sulfate.

9. LABROAD tampered with both bottles of morphine sulfate. LABROAD diluted Patient 1's morphine sulfate by removing morphine sulfate and replacing the removed liquid with another solution. One of the diluted bottles contained only approximately 77-83% of the declared concentration of morphine sulfate, and the other bottle was also diluted.

COUNT ONETampering with a Consumer Product
(18 U.S.C. § 1365(a)(4))

The United States charges:

10. On or about May 12, 2022, in Danvers, in the District of Massachusetts, the defendant,

LORALIE A. LABROAD,

with reckless disregard for the risk that another person would be placed in danger of death or bodily injury, and under circumstances manifesting extreme indifference to such risk, did tamper with a consumer product that affected interstate commerce, to wit, two bottles of the drug morphine sulfate prescribed to Patient 1, bearing the lot numbers and expiration dates listed below:

	Description	Lot Number	Expiration Date
1	Morphine Sulfate Oral Solution 100 mg per 5 mL (20 mg/mL)	8003E12671	September 2023
2	Morphine Sulfate Oral Solution 100 mg per 5 mL (20 mg/mL)	8003F13604	January 2024

and with the labeling and container for such products, by removing morphine sulfate from the bottles and replacing the removed liquid with another solution.

All in violation of Title 18, United States Code, Section 1365(a)(4).

Respectfully submitted,

JOSHUA S. LEVY
Acting United States Attorney

By: /s/ Lauren A. Graber
Lauren A. Graber
Assistant U.S. Attorney

Date: September 24, 2024